

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
MAYA ZABAR,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF
EDUCATION; MARISOL ROSALES,
SUPERINTENDENT OF HIGH SCHOOLS OF
DISTRICT 2; MANUEL UREÑA, PRINCIPAL OF
HIGH SCHOOL OF ART AND DESIGN; LYNN
ROSALES, ASSISTANT PRINCIPAL OF HIGH
SCHOOL OF ART AND DESIGN; SARI PEREZ,
ASSISTANT PRINCIPAL OF HIGH SCHOOL OF
ART AND DESIGN,

Defendants.
----- X

**DECLARATION OF
ASSISTANT
CORPORATION COUNSEL
SAMANTHA P. TURETSKY
IN SUPPORT OF
DEFENDANTS' MOTION
TO DISMISS THE
AMENDED COMPLAINT**

18 Civ. 6657 (PGG)

SAMANTHA P. TURETSKY declares that the following is true and correct
under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant Corporation Counsel in the office of Zachary W. Carter,
Corporation Counsel of the City of New York, attorney for Defendants in the above referenced
action.

2. I submit this declaration in support of Defendants' motion to dismiss the
Amended Complaint pursuant to Rule 12(b) of the Federal Rules of Civil Procedure ("FRCP"),
in order to place before the Court documents relied upon by Defendants in their motion.

3. Annexed hereto as **Exhibit "1"** is a true and correct copy of Plaintiff's
EEOC Charge in the Matter of Zabar v. New York City Department of Education, Charge No.
520-2018-02753, received on March 15, 2018, Plaintiff's request for Right to Sue Letter, dated
April 10, 2018, and Plaintiff's Right to Sue Letter, dated April 26, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: New York, New York
January 11, 2019

/s/

Samantha P. Turetsky
Assistant Corporation Counsel